

June __, 1999

Douglas L. Burleigh, Ph.D.
Regional Commissioner
United States Department of Education
Region V – Rehabilitation Services administration
111 North Canal Street, Suite 1048
Chicago, IL 60606

Dear Commissioner Burleigh:

Please find attached the required attachments as indicated in the Rehabilitation Services Administration (RSA) Policy Directive 99-03 necessary to amend the Michigan Commission for the Blind (MCB) State Plan that was approved for three years effective October 1, 1998. The attachments amending our State Plan Effective October 1, 1999 are as follows:

[Attachment 4.4](#)
[Attachment 4.9 \(c\)\(1\)](#)
[Attachment 4.11](#)
[Attachment 4.12](#)
[Attachment 4.12 \(d\)\(3\)](#)
[Attachment 4.12 \(e\)](#)
[Attachment 4.16](#)
[Attachment 6.7](#)
[Attachment 7.4](#)

In addition, MCB assures that it is administering its vocational rehabilitation and supported employment programs in accordance with those provisions of its currently approved title I State Plan and its title VI, part B supplement that remain in effect and with each of the new statutory requirements specified in the 1998 amendments.

Specifically, MCB is administering these programs consistent with the following sections of its currently approved title I State Plan and title VI, part B supplement:

Sections 1; 2.1; 2.2; 2.4; 3.3; 4.3; 4.4; 4.5; 4.6;
4.7; 4.8; 4.10; 4.11; 4.13; 4.14; 4.16;
5.2; 6.1; 6.3; 6.4; 6.5; 6.7; 6.9; 6.10;
6.12; 6.15; 7.3; 7.4; 7.5; 7.6; 7.7; 8.1;
8.2; 9.1 and 9.2

Further, MCB assures that it is administering our vocational rehabilitation and supported employment programs consistent with the following new sections from the preprint of the State Plan requirements in the 1998 Amendments:

Sections 3.1; 4.1; 4.2; 4.4; 4.9; 4.12; 4.13; 4.16
5.1; 5.3; 5.4; 5.5; 6.3; 6.5; 6.8; 6.10; 6.11;
6.12; 7.1; 7.2 and 9.3

MCB held hearings on June 18, 1999 from 2:00 p.m. to 4:00 p.m. in our eight regional offices. Public notice was provided through local newspapers and through a mass mailing which included all MCB vocational rehabilitation clients and interested partners throughout the state. Even though there was no requirement to provide public comment information, the comments were used to evaluate the proposed amendments will be given further consideration in the future, where pertinent. This packet was provided to the MCB Board prior to their June 21, 1999 board meeting for their review and comment.

Finally, this amended plan was submitted for the State review process/

We ask that you approve this plan as submitted for the fiscal year beginning October 1, 1999. If you have questions or comments, please contact Jim Buscetta at (517) 373-0579

Sincerely,

Patrick D. Cannon
Executive Director

ATTACHMENTS: several

ATTACHMENT 4.4: Views on State Policies and Administration of the State Plan (for State Agencies that have State Rehabilitation Advisory Councils)

After two years of concentrated effort the Michigan Commission for the Blind (MCB) developed a totally new Policy Manual that was implemented, with the input and approval of the MCB Board on January 19, 1998. For those reason few additional policy changes were developed during the current fiscal year. One exception is a policy on Affirmative Action that was recommended during our Technical Assistance Review in August of 1998. The initial Affirmative Action Policy Draft was presented at the MCB Board meeting on April 19, 1999 in Big Rapids, Michigan. Revisions were made and the final Policy was adopted at the Commission Board meeting on May 17, 1999 in Lansing, Michigan. (See [Appendix I](#))

Further policy is being developed regarding the mediation process that was outlined in the 1998 Amendments to the Rehabilitation Act of 1973. Currently, negotiations are underway with the Director of the Community Dispute Resolution Program, which operates under the State Court Administrative Office, to finalize policy to insure appropriate mediation services as outlined in the 1998 Amendments. We anticipate this policy will be complete and implemented early in the fiscal year beginning October 1, 1999. There are additional minor changes necessitated by the 1998 Amendments to the Rehabilitation Act. These are language and concept changes related to the Individual Plan for Employment. These changes will be made in policy and in our casework management system. They will be presented to the MCB Board for input, approval and implementation early in the fiscal year starting October 1, 1999.

A major effort for MCB during the next year will be developing the processes for implementing the key tenets of the Workforce Investment Act. Efforts will be undertaken to coordinate our staff participation in the various Workforce Investment Act Boards, including having the MCB Executive Director serve on the statewide board. In addition, we will develop a plan for deploying co-located staff at Work First offices throughout the state. As with all policy the MCB Board will be actively involved with these activities.

VR POLICY MANUAL

AFFIRMATIVE ACTION

It is the policy of the Michigan Commission for the Blind (MCB) to employ, as opportunities become available throughout our organization, the best qualified individuals, without regard to race, sex, color, religion, national origin, disability, age or other categories of groups protected by law. We are committed to promoting equal employment opportunity by employing and advancing persons based on merit, ability and potential for development.

MCB will continue to employ and develop employees, adhering to our policy of nondiscrimination which applies to all aspects of employment including, but not limited to the following: recruitment, hiring, placement, job classification, training development, promotion, transfer, job assignment, layoffs and grievances. Because members of minority groups are currently under represented in the field of rehabilitation, MCB will promote, initiate and support efforts involving colleges, high schools, community organizations and other interested parties to insure that highly qualified individuals, including MCB clients, from all under represented groups receive training in Vocational Rehabilitation Counseling, Rehabilitation Teaching, Orientation and Mobility, and any other areas that would benefit MCB clients.

MCB will review, identify and correct those internal policies, procedures or work conditions that are barriers, to provide all persons equal employment opportunity.

MCB will provide services to our clients without regard to race, sex, religion, age, national origin, color, marital status, impairment or political belief.

MCB will notify staff and clients of the goal, objectives and proper execution of this policy and will maintain a working environment where all employees find equal opportunity for advancement.

ATTACHMENT 4.9 (c)(1): Cooperation with Agencies that are not in the Statewide Workforce Investment System

MCB is in the process of obtaining cooperative working agreements with various entities as indicated in the 1998 Amendments to the Rehabilitation Act. Already approved is an updated agreement with the Department of Education Special Education and Early Intervention Services. (See [Appendix II](#)) MCB has also begun talks with the Michigan Higher Education Association to determine if one agreement could be written for higher education, as opposed to writing an agreement with each institution. Further work will be done to obtain cooperative working agreements with the Michigan Commission on Hispanic Affairs and the Michigan Commission on Indian Affairs. Where it will be helpful to expedite services to individuals who are blind, we will attempt to extend these statewide agreements to local entities.

MCB will develop standardized formats for supported employment, cash match and intervenor agreements as well as agreements for use with our community partners. These will be developed with procedural memorandums and will be implemented with staff training prior to the beginning of the fiscal year starting October 1, 1999. It is anticipated that staff will utilize these forms to formalize our working relationships with various local entities. It is also anticipated that these forms and activities will help to standardize services and expectations statewide.

Appendix II

JOINT AGREEMENT
MICHIGAN DEPARTMENT OF EDUCATION
OFFICE OF SPECIAL EDUCATION AND EARLY
INTERVENTION SERVICES
AND
FAMILY INDEPENDENCE AGENCY
MICHIGAN COMMISSION FOR THE BLIND

INTRODUCTION/PURPOSE

The Michigan Department of Education-Office of Special Education and Early Intervention Services (MDE-OSE/EIS) and the Family Independence Agency- Michigan Commission for the Blind (FIA-MCB) affirm through this joint agreement a shared commitment to provide a continuum of coordinated education, rehabilitation, and other community services for students who are blind or visually impaired.

This agreement focuses on the mandates for transition services described in the Rehabilitation Act, as amended in 1998, and the Individuals with Disabilities Education Act (IDEA). The services are to be provided in collaboration with other state and community agencies, who either by mandates and/or law or local partnership arrangements, provide transition services for students who are blind or visually impaired. These services are defined as a coordinated set of activities, designed within an outcome-oriented process that promotes movement from school to post-school activities including:

- Post-secondary education
- Vocational training
- Integrated employment (including supported employment)
- Continuing and adult education
- Adult services
- Independent living, and
- Community participation
- Vocational Services

The MDE-OSE/EIS and FIA-MCB agree to work together to establish statewide policies, procedures, and practices for services to students who are blind or visually impaired. These policies, procedures, and practices are to be based on the following principles:

STUDENTS FIRST

Education and support services tailored to the needs and abilities of the individual student with active involvement of the student throughout the Individualized Education Program (IEP) and the Individualized Plan for Employment (IPE) processes. The department should investigate ways of collecting information on visual impairments, legal blindness, and deaf-blindness.

SEAMLESS EDUCATION AND SERVICE DELIVERY SYSTEMS

Unified education systems linked with seamless community delivery systems that prepare and support students who are blind or visually impaired for employment and community inclusion.

COMMUNITY CONTROL

Local communities implementing change consistent with improved student outcomes, including active involvement of students, families, educators, MCB counselors, and other key stakeholders in the planning/implementation processes.

STUDENT AND FAMILY INVOLVEMENT

Student, family, and broad-based stakeholder involvement with local transition planning is a shared responsibility.

Written partnership agreements are essential for effective interagency service delivery. When an agreement is negotiated between the Michigan Commission for the Blind and any local school district, it should be coordinated with the Intermediate School District. Such agreements may include a cash-match component.

Arrangements using non-federal dollars from state and local school funds may be combined for the purpose of generating additional federal rehabilitation dollars. The combined pool of state dollars and funds can then be used to support programs and services as identified in the written partnership agreement. The agreements and cash-match arrangement may be developed for an individual student, a local district, or an Intermediate School District.

It is expected that all individualized student services and programs supported through a written partnership agreement will be developed through a collaborative planning effort and described in the student's IEP and IPE.

Respective Roles and Responsibilities of Participants to This Agreement

1. Participants will convene at least annually, and more often as necessary, to review, address, and facilitate resolutions of concern relating to transition services for students who are blind or visually impaired.
2. Participants will assign staff responsible for implementing the joint agreement.
3. Participants will define a system for collection and use of meaningful data that includes demographics, service delivery patterns, and outcomes resulting from the provision of services and supports. Data collection and evaluation must be coordinated with other partners providing transition services.
4. Participants will facilitate non-duplication, interagency coordination/collaboration, and comprehensive service delivery.
5. Participants agree that all transition service decisions for students who are blind or visually impaired, related to activities which will impact on the other agency/group will be jointly developed, discussed, disseminated, and implemented.
6. Participants will develop a process to provide for annual evaluation of the contribution of its program and service delivery to the implementation of the agreement.
7. Participants will collaborate with one another in planning, developing, and conducting in-service training.
8. Participants will be jointly responsible for assisting local schools and community agencies/groups with development and maintenance of local practices that meet the education/transition service needs of students who are blind or visually impaired.
9. Participants will be jointly responsible for developing a general guide for the planning process to develop educational plans and vocational plans that establish compatible goals aimed at providing valuable growth experiences to truly prepare the

student for transition to community and adult life. Planning processes should facilitate student self-determination and informed choices in goals and services.

10. Participants will advocate for the rights and interests of students who are blind or visually impaired in all education/human service/work force reform initiatives implemented at the state level.
11. Participants will be jointly responsible for addressing resource needs to support comprehensive transition service responses for students who are blind or visually impaired which result in a free appropriate public education coordinated with a long-term rehabilitation plan leading to career-path employment and independent living post-school options.

Role and Responsibilities of MDE/OSE/EIS

1. Administratively responsible for implementing federal IDEA legislation and Michigan's Administrative Rules for Special Education related to the provision of transition services, including monitoring.
2. Prepares and submits the required State Plan for special education students, which includes the provision of transition services.
3. Provides technical assistance and training to appropriate staff at the state and local levels to facilitate the coordination of academic, functional, vocational, and community-based curricula.
4. Encourages Local Educational Agencies (LEAs) to invite vocational education, vocational rehabilitation, and other adult service agency personnel to participate, as appropriate, in the transition IEP process.
5. Requires LEAs to implement the transition services as determined by the IEP.

Special Data Collection Information

The Michigan Department of Education annually collects information on each student enrolled in special education. The data elements collected on each student are described in detail in the Technical Manual for the Special Education Student and Personnel Data Count for 1998. This annual data collection allows MDE to identify each visually impaired student within the state. Students are counted within their attending district. Items of personal information collected on each student are as follows: handicapping condition, birth date, gender, and ethnic code. A number of program related items are also collected on each student. These program items are: date of students Individual Education Plan, full-time equivalency in special education, special education classroom or teacher consultant program, and support services assigned to each student. Utilizing summary statistical programs, visually impaired student statistics can be generated. At this time, the department is able to identify students with visual impairments or students receiving services in classrooms for the visually impaired, teacher consultant services for the visually impaired, or orientation and mobility. The department currently does not have the ability to distinguish between visually impaired and legally blind students. At one time, the department collected this information.

The department should investigate ways of collecting information on visual impairments, legal blindness, and deaf-blindness.

Role of MCB in Providing Transition Services for Students Who are Blind or Visually Impaired

1. Assigning staff to work with local schools and students who are blind or visually impaired consistent with the purpose and role statements as defined in The Fundamentals of Transition, (as amended) jointly develop by MJC/MRS and MDE/OSE-EIS.
2. Informing school personnel, students and families of MCB programs and services, as well as eligibility requirements and referral procedures for students eligible under Section 504 of the Rehabilitation Act.
3. Developing effective local transition service option for students who are blind or visually impaired which can respond to individual education, employment and service needs.
4. Coordinating IEP/IPE and any other prospective service plans for students who are blind or visually impaired which provide

opportunities for self-determination and informed choice on the part of the student.

The signatures below warrant that they are empowered to enter into this joint agreement and that it is hereby accepted.

Family Independence Agency
Michigan Commission for
the Blind

Michigan Department of Education
Office of Special Education
and Early Intervention Services

Patrick Cannon
Executive Director

Jacquelyn J. Thompson, Ph.D.
Director

ATTACHMENT 4.11: The State's Procedures and Activities for the Establishment and Maintenance of a Comprehensive System of Personnel Development to Ensure an Adequate Supply of Qualified Professionals and Paraprofessionals for the Designated State Unit

INTRODUCTION

MCB continues to be committed to the belief that only the highest qualified rehabilitation professionals should be hired to serve the blind consumers of this state. We will continue to use "*eligible-to-become*" a Certified Rehabilitation Counselor (CRC) as the standard requirement for our agency Rehabilitation Counselors and Counselor-Teachers. MCB will continue to work toward this standard while seeking the best qualified candidates for our positions. In some instances MCB may hire candidates who are close to this standard and assist them in meeting the standard as quickly as possible. We currently have an approved Comprehensive System for Personnel Development (CSPD) section to our state plan. This document will provide an update and explain changes to the original document.

DATA SYSTEM

The table below indicates the number and type of rehabilitation personnel currently working for MCB. There are three staff who have received a dual master's degree from Western Michigan University in rehabilitation teaching and rehabilitation counseling. They are assigned a caseload and perform the duties of a counselor and teacher. The three assistant regional supervisors carry a small caseload. The regional supervisors do not carry a caseload but may, on occasion, manage a case if extraordinary circumstances warrant it.

Personnel	# of staff
Rehabilitation Counselors (field offices)	12
Rehabilitation Teachers (field offices)	8
Rehab. Counselor/Teachers (Dual Degree)	3
Rehabilitation Teachers (training center)	12
Rehabilitation Counselors (training center)	2

Assistant Regional Supervisors	3
Regional Supervisors	3

The next item is the ratio of personnel to applicants and eligible individuals served. At the beginning of fiscal year starting October 1, 1999 MCB had 1250 active cases. The table below indicates the anticipated need for the next five years of competitive and homemaker cases:

Number of consumers served in 2004 (Based on a 3% increase per year)	1501
Number of anticipated openings by 2004	5
Number of field staff in 2004 with full caseloads if no new positions are filled	22

To meet the anticipated need for new, qualified counselors it is necessary to have an understanding of the number of students who are expected to graduate from master degree level programs. Even though the number of graduates will be acceptable, steps must be taken by the agency to recruit these individuals and make sure they are on the appropriate Civil Service registers. The table below demonstrates the anticipated number over the next couple years:

	Total current enrollment	# of minority students	FY '99 graduates
Michigan State University	30	10	12
Wayne State University	56	31	11
Western Michigan University	11	5	4

RECRUITMENT AND RETENTION

At the present time, we believe that approximately 62% of our staff meet the standard for the CRC exam. The table below looks at the

current level of compliance of our counselors who carry a caseload and the anticipated need in order to be 100% compliant with the CSPD regulations:

Certified Rehabilitation Counselors	3
Master's Degree in Counseling or Rehabilitation Counseling	10
Need to take coursework to reach the state standard of qualified rehabilitation counselor	8

The agency will continue to recruit and hire persons with disabilities and minorities. Currently, approximately 25% of the field staff and central office staff are individuals with disabilities and approximately 18% are minority. These percentages are higher than those in the general population and we anticipate they will remain steady. We will continue to work closely with the three graduate programs in an effort to recruit minorities and persons with disabilities. As noted in our approved State Plan last year, we will do what we can to work with undergraduate programs to encourage students with disabilities and minorities to consider professional rehabilitation as a career. Mr. Leamon Jones, MCB Regional Supervisor in Detroit has been designated to work as a liaison with Wayne State University in Detroit and the Region V Rehabilitation Continuing Education Program to coordinate minority individuals into the Rehabilitation Counseling Program. MCB also encourages all employees to participate in their respective professional organizations. In addition to increasing skills and knowledge in rehabilitation, it allows members to keep public sector rehabilitation visible as a place where new graduates and others would seek employment.

PERSONNEL STANDARDS

The State of Michigan does not have an established personnel standard that defines "qualified rehabilitation counselor". Therefore, MCB will relate to the national standard alluded to in the 1998 Amendments to the Rehabilitation Act of 1973. That standard is interpreted as the equivalent to Certified Rehabilitation Counselor. We anticipate being able to meet that standard by the year 2004 as called for in our Comprehensive System of Personnel Development and as outlined in the grant obtained to implement this rather ambitious plan.

MCB will continue to recruit the best-qualified candidates and, where deficiencies exist, we will continue to work to bring those candidates up to the standard.

Current staff with an unrelated degree will be required to complete the necessary coursework to be eligible for the CRC exam. Our goal is to have everyone eligible for the exam by September 30, 2004. We will encourage all staff to obtain the certification once they are eligible to take the CRC Exam.

A survey was done last year to begin the process of determining the current needs of staff to meet the standard. We have 8 staff with unrelated degrees who will, in all likelihood, need to obtain a new master's degree. We have about 3-4 staff who have the educational requirement but may require a period of supervision from a CRC to meet the standard. We do not anticipate any major problems with identifying qualified candidates for future vacancies. There have been recent discussions with the leadership from the three graduate programs to encourage students nearing graduation to complete a civil service application. There is no examination but policy does not allow their name to be put on the register until they have graduated. By that time, many of them have secured employment elsewhere.

STAFF DEVELOPMENT

The training needs of staff are addressed in many ways. First of all, a training needs survey is requested from each staff person to get a better understanding of their individual needs. Input from managers is also a primary source of input for training need.

A training grant from Rehabilitation Services Administration (RSA) provides a portion of the funding needed to train staff each year. A major portion of this grant was based upon a training needs assessment done agency-wide. The objectives of that training grant are:

1. To improve the job placement skills of staff to increase the number of competitive employment outcomes.
2. To operationalize the new federal regulations into the policies of the Michigan Commission for the Blind to provide better services to consumers.

3. To increase knowledge for counselors and teachers of specific disabilities.
4. Increase knowledge of computer access technology including the purchase, set-up, and maintenance of that equipment.
5. To increase operational knowledge of the Workforce Investment Act to better coordinate services to individuals who are blind.
6. To provide ongoing access to current research in the field of rehabilitation to keep staff aware of the latest findings regarding rehabilitation.

To meet the training needs of those individuals required to obtain a new master's degree, a joint effort was put together by MCB and our sister agency, the Department of Career Development Rehabilitation Service (DCDRS) to write a grant to help pay the costs of these programs. This five-year grant totaling over \$200,000 was written with input from all three graduate programs in Michigan. It will be effective as of October 1, 1999. The first step in meeting the CSPD requirements has begun. We have instructed all appropriate staff to submit their application to Commission on Rehabilitation Counselor Certification (CRCC) so that a determination can be made regarding their eligibility to take the exam. Once that information is gathered we will take specific steps toward enrolling staff in the graduate programs. We expect 1 or 2 people may begin fall 1999, but most will not start until winter or summer of 2000.

Although MCB does not have a formal succession plan, heavy emphasis is being placed on preparing staff to take on supervisory and management roles. We are committed to identify, promote, and nurture leadership within the agency. Many staff have taken numerous classes related to supervision, management and leadership. MCB is presently considering an extensive leadership training course offered through the Capitol Quality Initiative and Lansing Community College during the fiscal year starting October 1, 1999.

COMMUNICATIONS

All training materials, instruction, and communication will be done in the individual's mode of preference. For our staff, that usually means in a format such as Braille, large print, or voice-output. Ongoing steps are being taken to insure that staff has access to Braille. The agency has secured Duxbury translational software to produce Braille for

clients and staff. In addition, MCB will be providing refreshable Braille capability to staff as funding is available. Several staff have begun using this equipment to become more efficient.

If the need arises for foreign or native language interpreters extensive efforts will be made through various means, including international centers in Detroit, Lansing and other major cities. Staff may also bring a number of other resources to bear in attempting to obtain these services. In Detroit we are anticipating an Innovation and Expansion Grant to assist Arabic students who are blind to utilize computers to learn English.

MCB has several staff well-versed in sign language to better serve our clients who are deaf and blind. In addition we have in place procedures for obtaining additional sign language interpreters, as necessary.

COORDINATION

As can be seen this total training program with the In-Service Training Grant and the Special Grant to meet the needs of our Comprehensive System for Personnel Development is very extensive and in the case of the latter, the grant has been obtained with significant collaboration. MCB has not had an extensive effect on staffing through the IDEA Law. However, our added emphasis on transition services and our outreach efforts to identify students who are blind will put us in a better position to understand the staffing needs identified through IDEA and how best to meet those needs. There will be some coincidental collaboration by way of these working relationships with the schools and through the graduates of the various rehabilitation programs in the state.

As indicated the MCB Board continues to be actively involved with the development and implementation of staff development. MCB continues to operate under the CSPD approved last fiscal year for three years.

ATTACHMENT 4.12: State's Assessments, estimates, goals and priorities; Strategies and Progress Reports

MCB has entered into a joint effort with our sister agency, DCDRS to do an extremely comprehensive assessment of rehabilitation needs of individuals with disabilities in Michigan. We have started this process due to the fact that a comprehensive study has not been done in several years. The findings of this study will be included in next fiscal year's state plan. Currently, input about the needs of clients is being obtained through strategic planning committees related to several areas of clients' needs. The committees are as follows: 1. Skills of Blindness 2. Un-served and Under-served 3. Transportation and 4. Technology. In addition, MCB obtains significant feedback through our Consumer Involvement Council. We believe these various groups give a fairly comprehensive view of the needs of our constituents and assist us in planning to meet those needs.

MCB has set a rather challenging goal of obtaining 180 competitively employed individuals for this fiscal year with the anticipation of eventually reaching a goal of 200. We plan to do this by encouraging those individuals who previously chose homemaker as an employment goal to consider obtaining employment at least on a part time basis as at least a possible option. We also believe that by obtaining referrals earlier in the education process that we might inform students about the benefits of obtaining employment.

A major priority continues to be serving individuals with severe impediments to employment. Supported employment programming is vital in this area, as are services to individuals who are blind and deaf. To that end MCB continues to support special services for individuals who are deaf and blind. This program is characterized by intensive services by staff and purchase of service with a reduced caseload size.

ATTACHMENT 4.12 (d)(3): Efforts to Overcome Identified Barriers Relating to Equitable Access to and Participation of Individuals with Disabilities in the Vocational Rehabilitation and Supported Employment Programs.

MCB has identified several general and specific barriers relating to access of individuals to participating in Vocational Rehabilitation and Supported Employment Programs. The lack of transportation continues to be a major obstacle for individuals who are blind to obtain employment and even participate in rehabilitation services. Besides our Transportation Strategic Planning Committee, several staff are actively involved in local transportation advisory boards. For example, Our Executive Director is on the board of the Capitol Area Transportation Authority. In addition, the Director of Consumer Services participates in State Department of Transportation Planning Committees. Staff are involved in various local transportation groups and continue to advocate for accessible public transportation.

A second major barrier is that of public attitude toward individuals who are blind. MCB staff continue to take every opportunity to speak to community, employer, professional and any other groups which might help overcome the negative concepts about how individuals who are blind function. This is a continuous educational process. Staff will continue to take every opportunity to provide positive public relations.

A third barrier on which MCB will continue work is that of identifying students who are blind early enough in their schooling to provide some meaningful assistance in their educational process. We anticipate that our newly signed agreement should provide us with better information about the numbers and locations of students who are blind. It is our intent to assist in the planning of services to every student who is blind in Michigan. We believe we have the resources to achieve this goal, but have been unable to identify these students in a timely fashion. MCB will pursue this goal on a statewide basis.

ATTACHMENT 4.12 (e): Innovation and Expansion Activities

The primary objective of the MCB Innovation and Expansion Grant program is to emphasize services that produce competitive outcomes for our clients. However, priority will also be given to those projects that will provide special outreach to minority populations including Hispanics, American Indians, Blacks and Arab Americans. In addition, grants to enhance services to our most severely impaired clients will be emphasized. Finally, Innovation and Expansion grants will be considered for purposes enhancing technology for individuals who are blind, especially as that technology relates to adaptive computer equipment and Braille.

ATTACHMENT 4.16: Mediation and Impartial Due Process Hearing Procedures

MCB is currently working to secure appropriate mediation services as required by the 1998 Amendments to the Rehabilitation Act of 1973. Currently, we have an approved process for handling Administrative Reviews and Fair Hearings. However, the 1998 Amendments to the Rehabilitation Act require MCB to develop and implement mediation services. For that reason, we have entered into discussions with Mr. Douglas A. Van Epps, J.D. Director, Community Dispute Resolution of the Michigan Supreme Court, State Court Administrative Office. We believe we will be able to provide adequate mediation services state wide through his staff of trained mediators. Joining with our sister agency the Department of Career Development Rehabilitation Services we will provide a statewide in-service training program about rehabilitation services for these mediators. In addition to a long history of community dispute resolution, Mr. Van Epps organization has an impressive history of ADA mediation being the first of its kind in the nation. We believe this rich background should lead to more than adequate mediation services for MCB clients. We anticipate implementation of this service early in the fiscal year beginning October 1, 1999.

ATTACHMENT 6.7: Order of Selection

For the last three years the Michigan Commission for the Blind has operated under an Order of Selection. Originally, the Order was invoked due to some uncertainty in financial resources. MCB was also 17 staff short due to a one-time early retirement plan. At that time it was felt that it was prudent to develop the Order of Selection at the beginning of the year and then restrict services in categories if and when it became necessary. The alternative would have been to amend the state plan during the fiscal year. This would have entailed new public hearings and additional approvals by the MCB Board and the Rehabilitation Services Administration. The process would have taken too long to effectively deal with a resource crisis. During the first year services were restricted in the two categories representing the least impaired individuals. These restrictions lasted only to the end of the fiscal year. Last year, even though provisions were made for restrictions in services by way of an approved Order of Selection, the need to implement restrictions did not materialize. We believe that there is now a higher level of stability with staffing and finances such that an Order of Selection will not be necessary for the fiscal year starting October 1, 1999. We are therefore not requesting an approval for an Order of Selection.

ATTACHMENT 7.4: Goals and Plans for Distribution of Title VI, Part B Funds

Our goal for the fiscal year starting October 1, 1999 will be to more effectively identify individuals who are appropriate to be served through the MCB Supported Employment Program. We have taken steps to strengthen our position in providing transition services to students who are blind. Many of these students are also appropriate candidates for supported employment. It is felt that the MCB Supported Employment Program will also appropriately serve a high percentage of those students receiving transition services. Our objective for this year will once again be to stress the importance of this program on a statewide basis. One additional aspect of our Supported Employment Program will be a new format for our Supported Employment Agreements. In the past we have been a part of large coalitions where all partners were basically involved with a uniform process. Because of the relatively small number of individuals with which we work, it is our opinion that we would be more effective developing an individualized agreement for each client. In this fashion the services can be designed and planned very specific to the individual. We will utilize a standard agreement form with the ability to tailor services to meet each client's needs. These agreements will still obligate the agreeing party to be responsible for the provision of follow along services. Illustrative of the progress MCB has made in transition services is a renewed interest in transition services to students who are blind in the Upper Peninsula of Michigan. We believe this is a good example of how the provision of transition services will lead to the need for supported employment services. This and other similar situations should provide for uniform expenditures throughout the state for supported employment.